

THE LAW OFFICES OF
J O S E P H A . B O N D Y

JOSEPH A. BONDY

STEPHANIE R. SCHUMAN
(OF COUNSEL)

1776 BROADWAY
SUITE 2000
NEW YORK NY 10019
TEL 212.219.3572
FAX 212.219.8456
JOSEPHBONDY@MAC.COM

January 24, 2020

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
Courtroom 706
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

We write in response to the Government's letter opposing our request for production of materials produced by Apple, Inc. from Mr. Parnas's iCloud account in response to a October 21, 2019, warrant, stamped USAO_LP_00000021—USAO_LP_00000031, to the United States House of Representatives' Permanent Select Committee on Intelligence (HPSCI).

The materials taken by warrant from Mr. Parnas's internet service account are no different in character than materials seized from his home or person and are responsive to HPSCI's subpoena for:

Any and all documents supplied in response to any subpoena, search warrant, seizure warrant, summons, or other legal writ, notice, investigation or order or request for information, property, or materials, made by Congress or any U.S. federal or state agency.

(HPSCI Subpoena, Schedule at p. 2).

We should be allowed to provide these materials to HPSCI for use in its investigation, along with any other materials that have been similarly seized, without limitation.

At the very least, the Government can excise the data it believes is not generally available to Mr. Parnas, and allow us to provide the remainder to HPSCI as a file, rather than requiring us to expend the time and resources required to independently restore and download his iCloud account contents.

Thank you for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy
Stephanie R. Schuman
Counsel to Lev Parnas

c: All Counsel